

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
v.) Case No. 3:24-cr-00064-1
CAMILO CAMPOS-HURTADO) Judge Richardson
a/k/a “Camilo Campos”)
a/k/a “Arturo Lopez”)
a/k/a “Hurtado Camilo Campos”)

AGREED PROTECTIVE ORDER FOR MATERIALS CONTAINING INFORMATION
ABOUT ADULT AND MINOR VICTIMS OR WITNESSES

The parties having filed an Unopposed Motion for Entry of a Protective Order for Materials Containing Information Adult or Minor Victims or Witnesses (D.E. 21). The Court having considered the motion, and being fully advised in this matter, hereby enters the following:

1. This Protective Order governs the discovery material in any format (written or electronic) that is produced by the government in discovery in the above captioned case related to the investigations of the Franklin Police Department (“FPD”) and Homeland Security Investigations (“HSI”) into the allegations in this case and the Defendant’s sexual exploitation of adult and minor victims, use of fraudulent immigration documents, and possession of identification documents without lawful authority. The discovery and evidence in this case, includes, but is not limited to, the following sensitive materials: (1) forensic interview(s) of the minor victim(s), (2) reports detailing the forensic interview(s), (3) recordings of law enforcement interviews of adult and minor victims and witnesses, (4) reports detailing law enforcement interviews of adult and minor victims and witnesses, (5) statements of adult and minor victims and witnesses, (6) law enforcement reports describing the identification of the adult and

minor victims, (7) medical records and/or lab reports related to medical treatment or testing of adult or minor victims following sexual exploitation by the Defendant, (8) photos of the adult and minor victims, (9) birth certificates of the minor victims, and (10) photographs of counterfeit social security cards (some or all of which contain actual social security numbers assigned to individuals other than the Defendant). For purposes of this Protective Order, these sensitive materials are collectively referred to as “Protected Material.” This Protective Order, however, does not cover any statements of the Defendant or his own words quoted or summarized by the adult and minor victims and witnesses or anyone else.

2. The United States will make available a copy of the “Protected Material” to defense counsel to comply with the United States’ discovery obligations. Possession of copies of these protected materials is limited to the attorney of record, investigators, paralegals, law clerks, experts, encrypted cloud storage services of the attorney of record, and assistants for the attorney of record (hereinafter collectively referred to as members of the defense team).
3. The attorney(s) of record and members of the defense team may display and review these discovery materials with the Defendant. The attorney(s) of record and members of the defense team acknowledge that providing copies of these discovery materials to the Defendant and other persons is prohibited and agree not to duplicate or provide copies of these discovery materials to the Defendant and other persons.
4. Any notes or records of any kind that the defense team makes relating to the “Protected Material” (e.g., handwritten notes or transcripts generated by or at the request of the defense team) shall be treated as subject to the Protective Order and not be disclosed to

anyone other than persons on the defense team, or the Defendant while in the presence of his defense counsel.

5. Prior to showing any “Protected Material” to any authorized person listed above (e.g., investigators and expert witnesses), defense counsel shall provide a copy of this Protective Order and ensure that it is followed. Defense counsel further agrees to advise the authorized person that at the conclusion of this case, the material must be returned to defense counsel. All authorized persons receiving material subject to the Protective Order shall be subject to this Protective Order and shall not further disclose the material except as permitted by its terms. Before first disclosing discovery material or its contents to any of the individuals or entities listed above, the defendant or his attorneys of record must give to the individual or entity a copy of this Protective Order and maintain a copy signed and dated by the individual or a representative of the entity until such time as all appeals in this matter, if any, are concluded.
6. Any violation of any term or condition of this Order by the Defendant, the Defendant’s attorney(s) of record, or any member of the defense team may result in that individual being held in contempt of court, and/or may subject that person to monetary or other sanctions deemed appropriate by this Court.
7. Nothing in this order should be construed as imposing any discovery obligations on the United States that are different from those imposed by case law and/or Rule 16 of the Federal Rules of Criminal Procedure and the Local Criminal Rules.
8. Any successor defense counsel assigned in this case shall be subject to this Protective Order.

9. Any discovery materials provided pursuant to this Order shall be returned to the United States Attorney's Office, including all copies, if in physical form, within ten days of the completion of the case before the Court or, if an appeal is taken, within ten days of the completion of the case in the United States Court of Appeals for the Sixth Circuit or Supreme Court of the United States. Any discovery material provided pursuant to this Order that is in digital form shall be deleted on the same time frame.
10. If the Defendant violates any term or condition of this Order, the United States reserves its right to seek a sentencing enhancement for obstruction of justice, or to file any criminal charges relating to the Defendant's violation.

Dated: _____, 2024

THE HONORABLE ELI J. RICHARDSON
UNITED STATES DISTRICT JUDGE

CERTIFICATION

By signing below, I, _____ (please print legibly), hereby certify that I have read this Order and agree to be bound by its terms.

Date

Signature